

### REMARKS

This is to acknowledge that in the above-identified Office Action Claims 6, 9 and 19 were specified as being allowable if amended so as not to depend from a rejected claim. In this regard, however, Claim 1, the only independent claim in the application, has been amended in a manner which is believed to be sufficient to render that claim allowable over the prior art for the reasons given below.

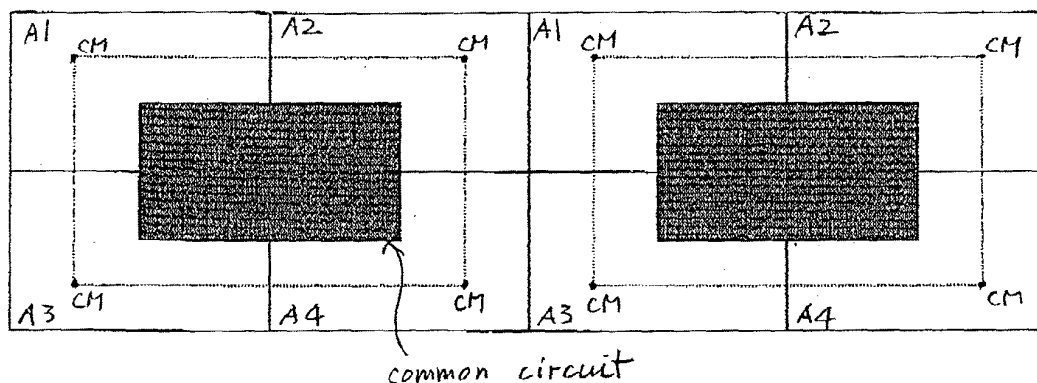
In particular, in the image sensing apparatus of Claim 1 a plurality of unit cells are required, and in each cell a common circuit is shared by a plurality of photoelectric conversion elements. The common circuit includes a transistor, and signals from the photoelectric conversion elements are output to and processed by the transistor. The signals are then outputted to the output line by the transistor after being processed. Disclosure of these requirements in Claim 1 is provided in Applicants' Fig. 10, for instance, where the signal processing circuit (common circuit) includes transistors  $M_{RES}$ ,  $M_{SF}$  and  $M_{SEL}$  shared by two photodiodes (photoelectric conversion elements) PD1 and PD2.

In contrast, element 47 in Imai, which is the primary rejecting reference relied upon in the Office Action, is a p+ diffusion layer and 48 is a wiring electrode. The p+ diffusion layer 47 and the wiring electrode are shared by four pixels, however, they are not transistors. 49 is a gate of a transistor, but formed for each of the four pixels, and is not shared by the four pixels. Accordingly, the Imai patent does not disclose that the shared circuit includes a transistor, nor that signals are processed by the transistor.

Furthermore, Claim 1 requires certain spacial relationships which are not disclosed by the Imai patent. That reference states that "four adjacent pixels are formed symmetrically with respect to a center point", however, there is no suggestion that the

distance between the centers of mass of the p+ diffusion layers 43 of the four pixels in one unit and of the four pixels in another unit are equally distanced. It is respectfully stressed that areas formed symmetrically with respect to a center point are not always distanced (substantially) equally.

The centers of mass of the p+ diffusion layers 43 happen to look equally distanced in Fig. 5A because the area of the p+ diffusion layers 43 are considerably large compared to the p+ diffusion layer 47, however, that does not mean that centers of mass of the p+ diffusion layers 43 are always equally distanced within and between unit cells. Reference is made for example to the following drawing which schematically shows a case where four areas A1~A4 are considerably small compared to an arrangement disclosed in Imai. In this case, the four areas A1~A4 are formed symmetrically with respect to a center point in each unit cell, but the centers of masses (CM) are obviously not equally distanced between the pixels.



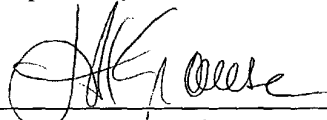
Accordingly, it is respectfully submitted that the Imai reference does not specifically disclose that the centers of mass of the photoelectric conversion elements are equally distanced.

As for the cited Guidash patent, there is no suggestion that the centers of mass of the photodetectors 31 are equally distanced.

In view of the foregoing amendments and remarks, Applicants respectfully submit that all of the claims are now allowable and the issuance of a formal notice of allowance is solicited.

Applicants' undersigned attorney may be reached in our New York Office by telephone at (212) 218-2100. All correspondence should continue to be directed to our address listed below.

Respectfully submitted,



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